

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

GOVERNMENT'S MOTION REGARDING ENGLISH-LANGUAGE TRANSLATIONS OF SPANISH LETTERS

The United States of America, by its attorneys, United States Attorney Michael J. Sullivan, and Assistant U. S. Attorneys Sandra S. Bower and Rachel E. Hershfang, respectfully moves for leave to introduce into evidence at trial (1) letters and notes received during the investigation of this case, which are in Spanish; and (2) English translations of those letters and notes. The government further requests leave to read into evidence all or part of the English translations. As grounds for this motion, the government states as follows:

1. During the investigation that led to this case, the government received statements of the defendant that were written in Spanish. The defendant is a native Spanish speaker.
 2. The government has prepared English translations of letters and notes that it anticipates using at trial. These notes are statements of the defendant Guillermo Vasco. The government has provided copies of these transcripts to the defense.
 3. The government moves for leave to introduce into

evidence at trial copies of the original Spanish letters and notes, as well as the English translations of those items, and to read into evidence all or part of the English translations. See United States v. Rengifo, 789 F.2d 975, 983 (1st Cir. 1986) (finding that English-language translations of tape-recorded conversations that originally took place in Spanish are admissible as substantive evidence; that such transcripts may go to the jury room; and that the government may use readers to read the English translations as an alternative to playing the tape recording).

WHEREFORE, the government respectfully requests that the Court grant:

1. Leave to introduce into evidence at trial copies of writings that are in part or in whole in Spanish, as well as the English translations of those writings and to read into evidence all or part of those English translations.

Respectfully submitted,

MICHAEL J. SULLIVAN
UNITED STATES ATTORNEY

By: /s/ Rachel E. Hershfang
RACHEL E. HERSHFANG
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Assistant United States Attorneys

October 30, 2006

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/s/ Rachel E. Hershfang
Rachel E. Hershfang